

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

**EVERETTE L. VANHOY and  
LUCILLE B. VANHOY,**

**CIVIL ACTION NO.**  
**1:18-cv-00090**

**Plaintiffs,**

V.

**AMERICAN INTERNATIONAL  
INDUSTRIES INC., et al.,**

## Defendants

§

**STIPULATION OF DISMISSAL OF DEFENDANT UNION  
CARBIDE CORPORATION WITHOUT PREJUDICE**

Pursuant to Rule 41 (a)(1) of the Federal Rules of Civil Procedure, Plaintiffs Everette L. Vanhoy and Lucille B. Vanhoy, by and through undersigned counsel, and with the consent of Defendant, Union Carbide Corporation, hereby stipulate and agree to dismiss all claims against Defendant Union Carbide Corporation only in the above-captioned action without prejudice, each party to bear its own fees and costs.

This 24<sup>th</sup> day of June 2019.

WE MOVE:

/s/ Mark J. Buha

Mark J. Buha  
(Admitted *Pro Hac Vice*)  
Dean, Omar Branham Shirley LLP  
302 N. Market Street Suite 300  
Dallas, TX 75202  
[mbuha@dobslegal.com](mailto:mbuha@dobslegal.com)

William M. Graham  
(NC Bar #17972)  
Wallace and Graham P.A.  
525 North Main Street  
Salisbury, NC 28144  
Telephone: (704) 633-5244  
[bgraham@wallacegraham.com](mailto:bgraham@wallacegraham.com)

*Attorneys for Plaintiffs*

WE CONSENT:

/s/ Moffatt G. McDonald

Moffatt G. McDonald, *Pro Hac Vice*  
W. David Conner, *Pro Hac Vice*  
Scott E. Frick, *Pro Hac Vice*  
Charles M. Sprinkle, III, NC No. 28096  
HAYNSWORTH SINKLER BOYD, P.A.  
ONE North Main, 2nd Floor  
P.O. Box 2048  
Greenville, SC 29602  
Phone: (864) 240-3200  
Fax: (864) 240-3300  
[mmcdonald@hsblawfirm.com](mailto:mmcdonald@hsblawfirm.com)  
[dconner@hsblawfirm.com](mailto:dconner@hsblawfirm.com)  
[sfrick@hsblawfirm.com](mailto:sfrick@hsblawfirm.com)  
[csprinkle@hsblawfirm.com](mailto:csprinkle@hsblawfirm.com)

*Attorneys for Union Carbide Corporation*

**CERTIFICATE OF SERVICE**

On June 24, 2019 the above and foregoing document was filed with the Clerk of Court via CM/ECF which will send notice to all counsel of record.

*/s/ Mark J. Buha*  
Mark J. Buha